

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE:	§	Case No. 22-60043
	§	
FREE SPEECH SYSTEMS, LLC,	§	Chapter 11 (Subchapter V)
	§	
Debtor.	§	

EXHIBIT I

June 21, 2022

NO. X-06-UWY-CV-18-6046436-S : SUPERIOR COURT
ERICA LAFFERTY, ET AL. : COMPLEX LITIGATION
DOCKET
:
V. : AT WATERBURY
ALEX EMRIC JONES, ET AL. : OCTOBER 21, 2021

NO. X-06-UWY-CV-18-6046437-S : SUPERIOR COURT
WILLIAM SHERLACH : COMPLEX LITIGATION
DOCKET
:
V. : AT WATERBURY
ALEX EMRIC JONES, ET AL. : OCTOBER 21, 2021

NO. X-06-UWY-CV-18-6046438-S : SUPERIOR COURT
WILLIAM SHERLACH, ET AL, : COMPLEX LITIGATION
DOCKET
:
V. : AT WATERBURY
ALEX EMRIC JONES, ET AL. : OCTOBER 21, 2021

AMENDED ORAL AND VIDEOTAPED DEPOSITION

APPEARING REMOTELY FROM

AUSTIN, TEXAS

ALEX JONES

JUNE 21, 2022

V O L U M E III

June 21, 2022

1 ANSWERS AND ORAL DEPOSITION OF ALEX JONES, a
2 witness produced at the instance of the Plaintiff, was
3 taken in the above-styled and numbered cause on the
4 21ST day of JUNE 2022, from 9:11 a.m. to 3:13 p.m.,
5 before VANESSA S. ROBERTSON, CSR in and for the State
6 of Texas, reported by machine shorthand, appearing
7 remotely from Parker County, Texas, pursuant to the
8 Texas Federal Rules of Civil Procedure.

June 21, 2022

1 REMOTE APPEARANCES:

2
3 FOR THE PLAINTIFF:

4 MR. CHRISTOPHER M. MATTEI
5 MS. ALINOR STERLING
6 MS. JESSICA HARTMAN
7 KOSKOFF KOSKOFF & BIEDER, PC
8 350 FAIRFIELD AVENUE
9 BRIDGEPORT, CONNECTICUT 06604
10 (203) 336-4421
11 cmattei@koskoff.com

12 FOR THE DEFENDANT:

13 MR. CAMERON ATKINSON
14 PATTIS & SMITH LLC
15 383 ORANGE STREET
16 FIRST FLOOR
17 NEW HAVEN, CONNECTICUT 06511
18 (203) 393-3017
19 catkinson@pattisandsmith.com

20 FOR THE DEFENDANT:

21 MR. MARIO KENNETH CERAME
22 BRIGNOLE & BUSH, LLC
23 73 WADSWORTH STREET
24 HARTFORD, CONNECTICUT 06106
25 (860) 527-9973
mario@brignole.com

ALSO PRESENT:

MR. MARK HENDRIX, VIDEOGRAPHER

June 21, 2022

1

2

3 Q How many cryptocurrency wallets are currently
4 linked to the Infowars.com donation page?

5 A I don't -- I don't know the specifics.
6 They're all linked right there. It's all public.

7 Q Okay. Who manages that for you?

8 A The IT department.

9 Q Okay. Which is who?

10 A I mean, right now, it's -- it's basically
11 myself and Zimmerman. He's a consultant. I don't
12 really understand it. But I'm the person that manages
13 it because I'm -- I mean, I've told them to set it up
14 and -- that --

15 Q Okay. So you have access to those crypto
16 wallets, correct, personal access?

17 A Yes.

18 Q And so does Zimmerman, correct?

19 A Yes.

20 Q Anybody else?

21 A I don't know the specifics of the technicals,
22 but it's like three people -- or you have to put like
23 three codes in. I've only messed with it a few times.
24 It's -- all of the transactions are public, that's what
25 the blockchain does, I know that. So it's all right

1 there.

2 Q The transactions are public, but who is
3 authorized to execute the transactions are limited to
4 people who have access to the wallets, correct?

5 A Yeah, so I have to -- I mean, I go in and I do
6 it.

7 Q Okay. So you personally execute the
8 transactions within each of those wallets linked to the
9 Infowars.com page, correct?

10 A I mean, I -- I mean, I go in there and then
11 they explain it to me and I do it, yeah.

12 Q Okay. And you're in charge as to when to
13 withdraw any cryptocurrency from those wallets,
14 correct?

15 A Yes.

16 Q Okay. Nobody else has authority to dispose of
17 the cryptocurrency assets in any of those wallets,
18 correct?

19 A No.

20 Q Beginning of -- on April 23rd of this year,
21 one of the wallets linked -- one of the cryptocurrency
22 wallets linked to Infowars.com started receiving large
23 donations of cryptocurrency from a single source,
24 correct?

25 A Yes -- well, there were other donations,

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1 too.

2 Q I'm sorry?

3 A Can you ask your question again?

4 Q Sure. Well, I think you've answered it. I
5 was asking what you said.

6 MR. ATKINSON: Would it be helpful
7 for the court reporter to read it back, Chris?

8 MR. MATTEI: No, no, I think I have
9 the answer. I'm just -- oh, yeah, I'd be happy to have
10 her read back his answer. Yes. Thank you.

11 THE WITNESS: I don't need them to
12 do that. The point is he said a single source. We
13 got -- there was quite a few of Bitcoin donations.

14 THE COURT REPORTER: Do you want me
15 to read it back?

16 MR. MATTEI: Yeah, thank you.

17 (Requested portion was read back.)

18 Q (By Mr. Mattei) So you know that I'm
19 referring to the single donor who donated over a
20 million dollars in Bitcoin on April 23rd, correct?

21 A Yes.

22 Q Okay. And then there was another donation of
23 just over a million dollars on April 30th from the same
24 donor, correct?

25 A Yes.

1 Q And there was another donation on May 19th of
2 about \$5.9 million worth of Bitcoin from that same
3 donor, correct?

4 A We believe it's the same donor. We don't
5 know.

6 Q Okay. Well, according to the identifying data
7 on the donor's wallet, it's the same wallet, correct?

8 A I believe so. I don't have it in front of
9 me.

10 Q And your testimony is that you don't know the
11 identity of the individual responsible for those
12 donations?

13 A I do not.

14 Q Okay. Do you know anybody who does?

15 A No.

16 Q Have you had any communication with anybody
17 representing themselves to be the donor?

18 A No.

19 Q And you cashed out about half of the Bitcoin
20 donated by that individual, correct?

21 A Yes.

22 Q And you did that personally, correct?

23 A Yes.

24 Q And where did those --

25 A I don't have it in front of me, but it's more

1 than half.

2 Q And what did you do with those proceeds once
3 you converted it to actual currency?

4 A I put it into a personal bank account of mine
5 and then I've transferred most of it to -- and am still
6 transferring it to Free Speech Systems as a capital
7 injection.

8 Q And so you -- you said you have transferred
9 and you are continuing to transfer those proceeds into
10 Free Speech Systems as a capital investment in Free
11 Speech Systems?

12 A I don't know the technical term for it, but I
13 am -- I intend to -- to -- to spend it -- to continue
14 Free Speech's mission of promoting freedom and
15 populism, because that's what I have seen the donations
16 give as. I don't know that -- I don't know why it was
17 given, but we were -- we've been asking for donations
18 to keep the company going. So it's my intent to use
19 the lion share of it to continue the operation.

20 Q And you have not yet done that, correct?

21 A No, I -- I've begun to do it. I -- it --
22 it's -- most of it is being transferred -- has been
23 transferred already into there.

24 Q Okay. Well, let's just be clear, okay? Of
25 the money that you cashed out and directed to your

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1 personal bank account, how much have you transferred
2 into Free Speech Systems?

3 A I don't have the exact accounting in front of
4 me, but an example is, some has gone directly into Free
5 Speech Systems, other has gone directly into legal
6 bills, but the things, generally, you know, dealing
7 with the operation of the company.

8 Q Well, you testified that you took a little bit
9 more than half, right? So you would say over --

10 A I think it's a lot -- I don't have the numbers
11 in front of me, but it's -- in fact, I was going to go
12 today after this and try to do the accounting on that
13 specifics, because I want to know that. Unfortunately,
14 we didn't transfer all of it out of Bitcoin. And
15 Bitcoin has crashed, so that's not good.

16 Q All right. So you transferred about \$4
17 million out from the crypto wallet to your personal
18 account after these donations were received, correct?

19 A I don't have the numbers in front of me, but I
20 think it's more than that.

21 Q Okay. Is it -- is it more than 5 million?

22 A It had already gone down so --

23 MR. ATKINSON: Objection to form.

24 You can answer.

25 A I don't have the specifics.

1 Q (By Mr. Mattei) Okay. You're -- and I'm not
2 holding you to a precise amount here, Mr. Jones, but
3 your testimony is that you believe that following the
4 May 19th donation from what appears to be a single
5 crypto donor, you executed a transaction withdrawing
6 between 4 and \$5 million from that wallet to your
7 personal bank account, correct?

8 A Yes.

9 Q Okay. And now I'm asking you, how much of
10 that 4 to \$5 million, roughly, have you transferred
11 into Free Speech Systems?

12 A I don't have the numbers in front of me.

13 Q So the answer is you don't know?

14 A Well, do I have your permission to go
15 speculate here, like it won't be 100 percent. I don't
16 have the exact numbers here in front of me.

17 Q I'm just trying to get a sense of, to the
18 extent that you have a reasonable basis to estimate,
19 that's fine. I don't want you to just pull a number
20 out of thin air and you have no idea. If you have a
21 reasonable basis to estimate how much you have
22 reinvested in Free Speech Systems, please give that
23 answer.

24 A Well, I don't know about the term reinvested.
25 It's just a capital, you know, injection to the

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1 company. It's -- it's -- some company bills have been
2 directly out of my bank account, my private bank
3 account, just for expediency. Instead of just
4 transferring it into Free Speech Systems and having
5 that, but more than 2 million has been transferred into
6 Free Speech Systems and paid out for back bills. And
7 then others has gone to legal bills. And then other
8 has gone to buy product so that we have product to
9 sell.

10 And it's my intent to do that with
11 basically all of the funds. I may keep some to
12 reimburse myself for past -- because I'm paid
13 privately, but my intent is to currently spend about 90
14 percent of it in -- into keeping Free Speech afloat
15 and -- and --

16 Q As it stands right now, I understand your
17 testimony to be that as of today you estimate that
18 about 2 million of the cryptocurrency proceeds that you
19 cashed out, you have injected into Free Speech Systems,
20 correct?

21 A No. If memory serves, over 2 million directly
22 into Free Speech Systems. And then I've been paying
23 other substantive bills for Free Speech Systems
24 directly out of my private account.

25 Q I'm -- I'm leaving out the bills for a minute.

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1 I'm just talking about direct transfer of money from
2 your personal account to Free Speech Systems comprised
3 of the cryptocurrency proceeds, that your testimony is
4 that that amounts to approximately \$2 million,
5 correct?

6 A I think it's approaching 3 million.

7 Q Okay. Fair enough. And then you claim that
8 you also used cash within your personal account, since
9 May of this year, to pay Free Speech Systems' bills; is
10 that right?

11 A Yeah, we paid a \$344,000 bill for the
12 bankruptcy yesterday out of it, out of my personal
13 account, that's an example.

14 Q Okay. A \$344,000 bill for the bankruptcy
15 associated with what?

16 A I mean, I just do my show and you guys -- just
17 a big, long war you got going on, so...

18 Q Okay. Well, you just -- you just testified
19 that you paid \$344,000 yesterday. What did you think
20 you were paying for?

21 A Paying for things associated with the
22 bankruptcy.

23 Q Who was the payee?

24 A It was a -- it was a long list. It was a long
25 bill.

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1 it again.

2 You'd agree with me that since
3 PQPR's formation, you, either directly or indirectly,
4 have had a controlling majority ownership stake,
5 correct?

6 MR. ATKINSON: Objection to form.
7 You can answer.

8 A Yes.

9 Q (By Mr. Mattei) Do you recall, Mr. Jones, in
10 connection with your divorce from Kelly Jones that you
11 had a valuation conducted of Free Speech Systems and
12 PQPR?

13 MR. ATKINSON: Objection to form.
14 You can answer.

15 A I do.

16 Q (By Mr. Mattei) And that valuation was
17 conducted for use in connection with your divorce,
18 correct?

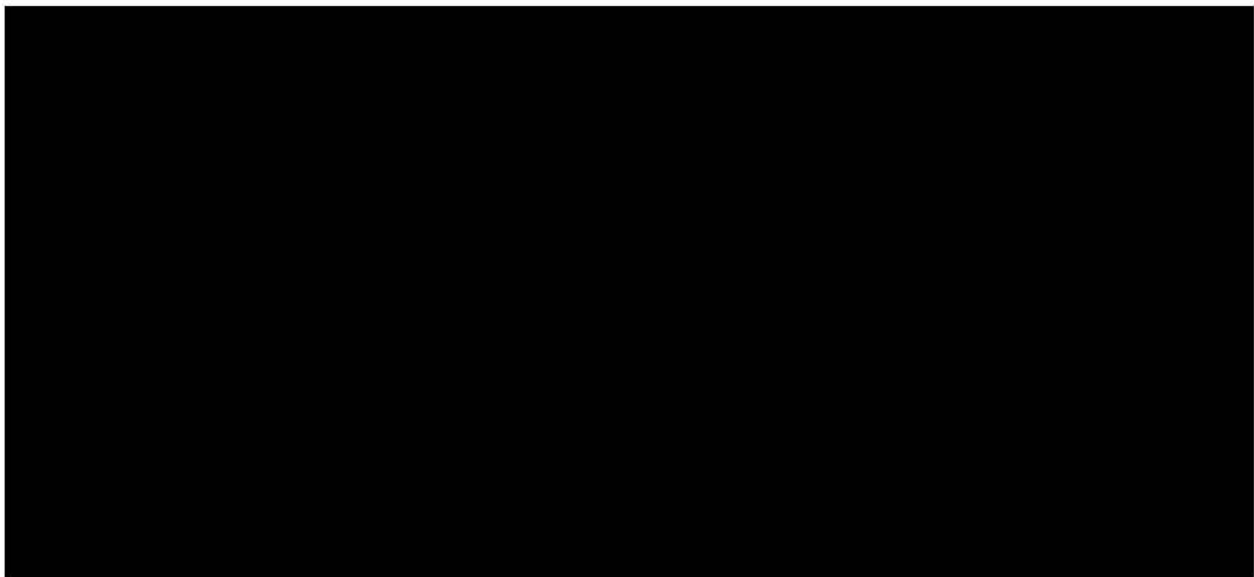
19 A Yes.

20 Q Do you know if that valuation was presented to
21 the court presiding over your divorce?

22 A I think it was.

23 Q Okay. Mr. Jones, I'm going to show you what
24 we've marked as Exhibit 185. And showing you Page 1.
25 Do you have before you the valuation that was conducted

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Q (By Mr. Mattei) Okay. So your testimony is that the majority of money that PQPR makes from the sale of supplements, it then reverts back to Free Speech Systems to pay for advertising, correct?

A Yeah --

MR. ATKINSON: Objection to form. You can answer.

Q (By Mr. Mattei) Is that correct?

A Well, here's the thing. I shouldn't even speculate or try to be helpful. It doesn't matter. Just make up whatever you want. Just keep going.

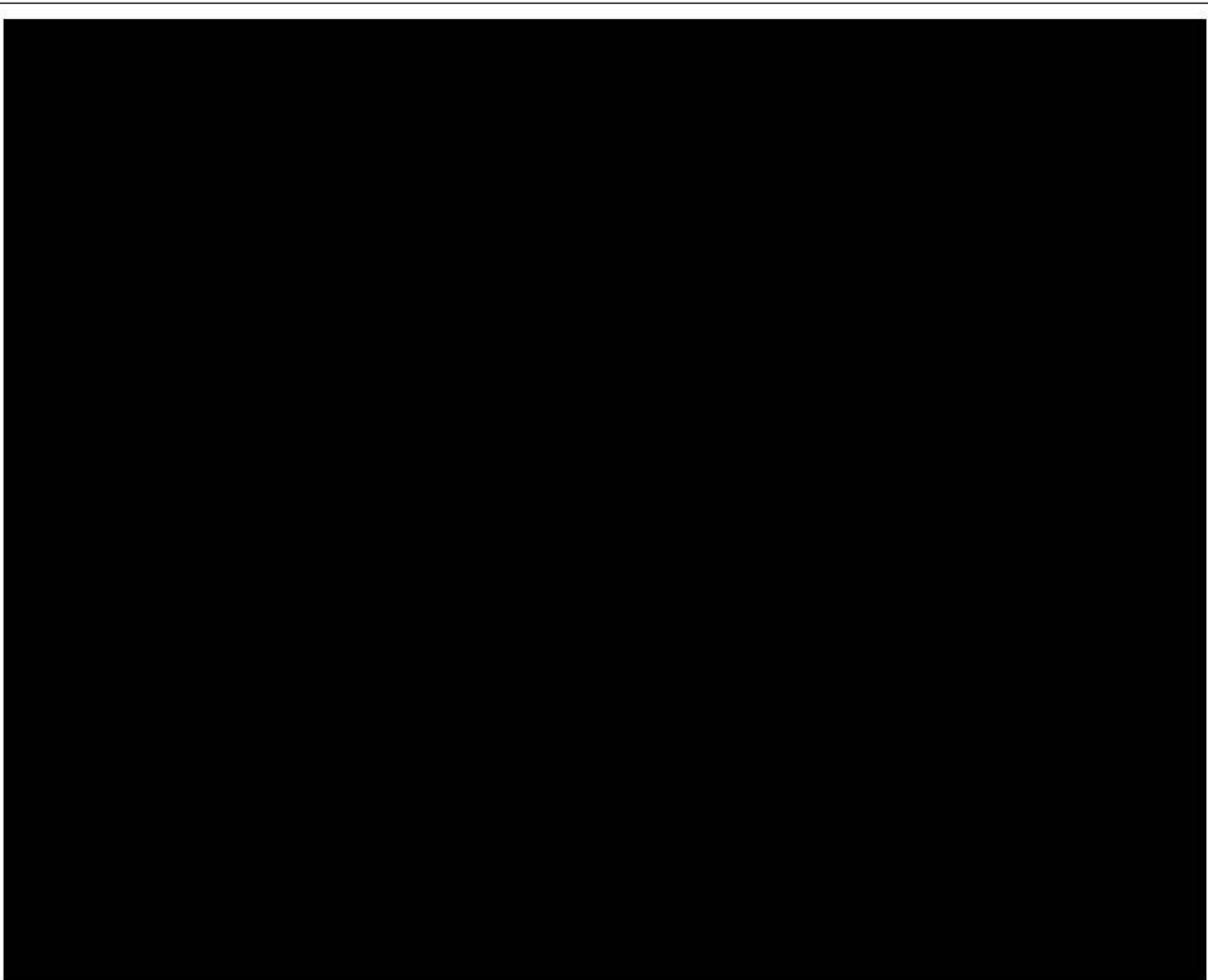
Q (By Mr. Mattei) Mr. Jones, you're the owner of Free Speech Systems, correct?

A Yes.

Q Okay. You just testified that the profits made by PQPR are sent back to Free Speech Systems to pay for advertising; did you not?

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I understand from your testimony that you believe that David Jones is claiming that under PQPR's agreement with Free Speech Systems, Free Speech Systems was supposed to send a percentage of sale proceeds to PQPR?

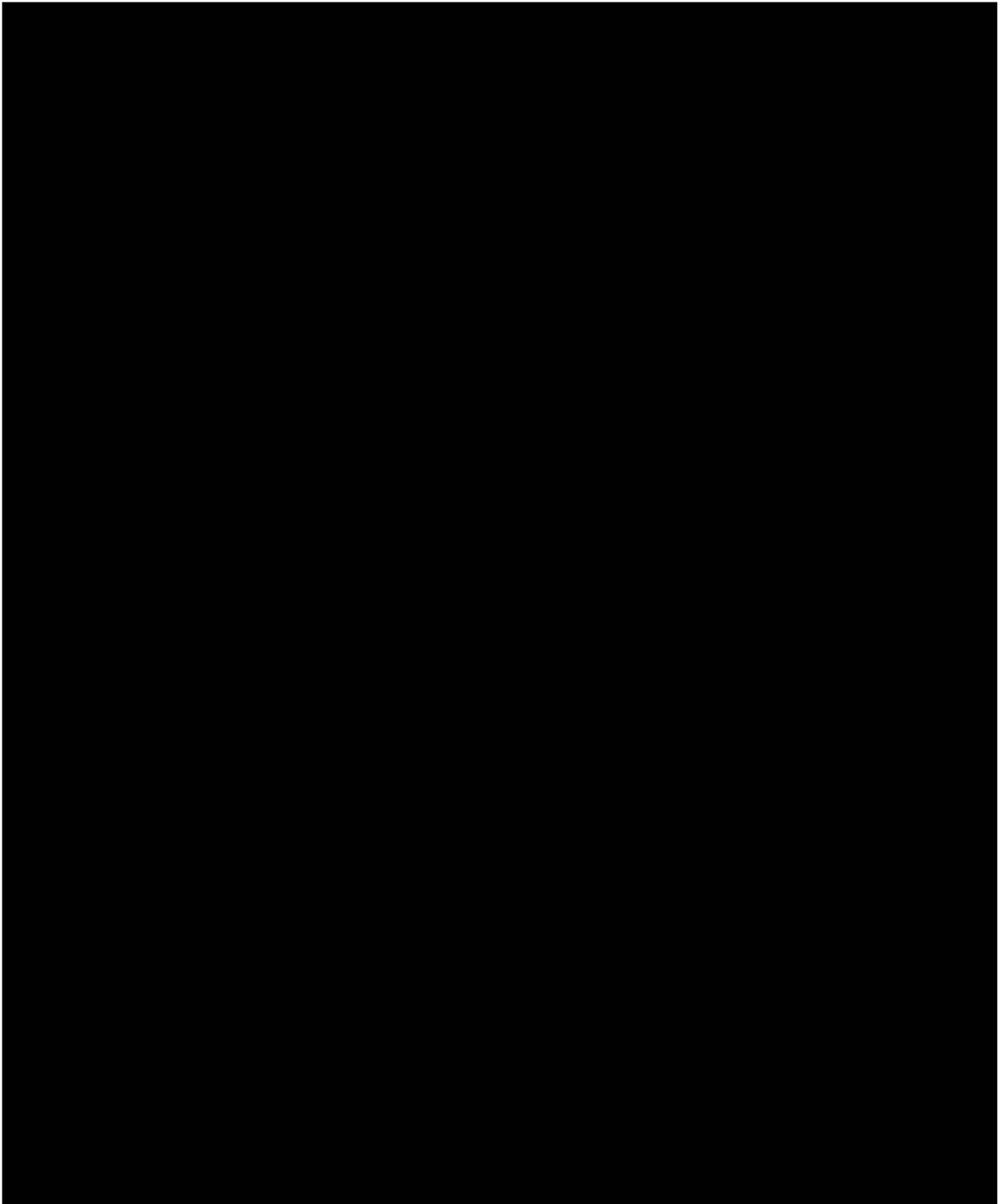
A Yeah, I forget the exact agreement. You'd have to -- I forget the exact agreement. The point is is it's not being paid under what the agreement is.

Q Right. And I'm just trying to figure out what's not being paid. I take it that you -- it's a percentage of the sale proceeds that PQPR claims it was

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1 owed --

2 A I don't know. It's something -- I don't
3 remember. In fact, I shouldn't even -- I'm just trying
4 to be helpful, but I just don't remember.



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Of Free Speech Systems' current employees, your testimony is that you are the most knowledgeable person to testify concerning the relationship between Free Speech Systems and PQPR, correct?

A Yeah, because none of them even know anything. They just run the radio and TV show. And then accounting just, under the agreement, pays -- pays PQPR.

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2 ERICA LAFFERTY, ET AL. : COMPLEX LITIGATION
3 : DOCKET
4 V. : AT WATERBURY
5 ALEX EMRIC JONES, ET AL. : OCTOBER 21, 2021

6
7 NO. X-06-UWY-CV-18-6046437-S : SUPERIOR COURT
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17 ALEX EMRIC JONES, ET AL. : OCTOBER 21, 2021

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21 REPORTER'S CERTIFICATION
22 DEPOSITION OF ALEX JONES
23 JUNE 21, 2022
24

25 I, VANESSA S. ROBERTSON, Certified Shorthand

June 21, 2022

1 Reporter in and for the State of Texas, hereby certify
2 to the following:

3 That the witness, ALEX JONES, was duly sworn by
4 the officer remotely and that the transcript of the
5 oral deposition is a true record of the testimony given
6 by the witness;

7 That the deposition transcript was submitted on
8 _____, 2022 to MR. CAMERON ATKINSON, for
9 examination, signature and return to me by
10 _____, 2022.

11 That the amount of time used by each party at the
12 deposition is as follows:

13 MR. CHRISTOPHER MATTEI - 2 hours, 32 minutes

14 MR. MARIO CERAME - 15 minutes

15 That pursuant to information given to the
16 deposition officer at the time said testimony was
17 taken, the following includes counsel for all parties
18 of record:

19 MR. CHRISTOPHER M. MATTEI, Attorney for
20 Plaintiff.

21 MR. CAMERON ATKINSON, Attorney for Defendant.

22 MR. MARIO CERAME, Attorney for Defendant.

23 I further certify that I am neither counsel for,
24 related to, nor employed by any of the parties or
25 attorneys in the action in which this proceeding was

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1 taken, and further that I am not financially or
2 otherwise interested in the outcome of the action.

3 Further certification requirements pursuant to
4 Rule 203 of TRCP will be certified to after they have
5 occurred.

6 Certified to by me this _____ day of _____,
7 A.D., 2022.

8
9
10
11
12
13 *Vanessa S. Robertson*

14
15 _____
16 VANESSA S. ROBERTSON
17 TEXAS CSR 4930
18 EXPIRATION Date: 04/30/2022
19 FIRM REGISTRATION No. 343

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